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In Re:

LAUREN M MCNAUGHT,

Debtors

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

Case No. 23-16204 RG

Chapter 13

**CERTIFICATION IN SUPPORT OF
MODIFIED CHAPTER 13 PLAN**

Hearing Date: July 16, 2025 @ 8:30 a.m.

Lauren McNaught, hereby certifies as follows in support of my Modified Chapter 13 Plan filed on 6/13/2025:

1. The 2021 BMW 228i that was being leased was returned to BMW in June 2024. I understand that BMW filed a deficiency claim for \$2,628.43 but I am not sure what it could be for. Because the claim appears to be filed as general unsecured it would not appear to be worth challenging or changing the treatment in the modified plan although I reserve my right to do so.
2. After the BMW was turned in I needed a new car. I was unable to qualify for a new lease or loan because of the bankruptcy so my father leased a car for me which I make payments on at \$486 a month.
3. My husband is not working although he is spending just about all of his time trying to find a job and

interviewing. He is also still has a real estate agent license, but he has not had any deals even though there's been a lot of effort. My mother watches our son while I works full time and my husband tries to find a job and get something going with real estate.

4. I cannot afford payments greater than the \$250 proposed in the modified plan as I am barely making it as it is and rely on family assistance to cover expenses and plan payment month to month.

I HEREBY CERTIFY that the foregoing statements made by me are true to the best of my knowledge, information, and belief. I am aware that if any of the foregoing is willfully false, I am subject to punishment for false swearing.

DATED:

7/10/25



Lauren McNaught